

RE: CARL R BOYD

) Case No. 20 B 04338
)
Debtor) Chapter 13
)
Judge: JACK B SCHMETTERER

NOTICE OF MOTION

CARL R BOYD

PO BOX 2214
COUNTRY CLUB HILLS, IL 60478

DAVID M SIEGEL
via Clerk's ECF noticing procedures

Please take notice that on August 12, 2020 at 11:00 am., I will appear before the Honorable Judge JACK B SCHMETTERER or any judge sitting in the judge's place, present the motion set forth below.

This motion will be presented and heard telephonically. No personal appearance in court is necessary or permitted. To appear and be heard telephonically on the motion, you must set up and use an account with Court Solutions, LLC. You can set up an account at www.Court-Solutions.com or by calling Court Solutions at (917) 746-7476.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the persons named above by U.S. mail at 55 E Monroe St., Chicago, IL 60603 or by the methods indicated on July 16, 2020.

/s/ Tom Vaughn

TRUSTEE'S MOTION TO DISMISS FOR UNREASONABLE DELAY

Now comes Tom Vaughn, Trustee in the above entitled case and moves the Court to dismiss this case in support thereof states:

1. On February 17, 2020 the Debtor filed a petition and plan under Chapter 13 of Title 11 U.S.C.
2. That the above-captioned plan has not yet been confirmed.
3. That the Debtor has caused unreasonable delay that is prejudicial to creditors by failing to:

Amend Plan and Schedule D to correct the model year of JP Morgan Chase's collateral as per its proof of claim.

WHEREFORE, the Trustee prays that this case be dismissed for unreasonable delay by the debtor pursuant to 11 U.S.C. § 1307 (c) (1).

Respectfully submitted,
/s/ Tom Vaughn

TOM VAUGHN
CHAPTER 13 TRUSTEE
55 E. Monroe Street, Suite 3850
Chicago, IL 60603
(312) 294-5900